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*Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENAJMIN F. DANIELS, an

**DEFENDANTS JASON R. ANDERSON,  
JACOB S. ANDERSON, SCHAD E.  
BRANNON, AND ROYDON B. NELSON  
AND RELIEF DEFENDANTS BUSINESS  
FUNDING SOLUTIONS, LLC, BLOX  
LENDING, LLC, THE GOLD  
COLLECTIVE LLC, AND UIU  
HOLDINGS, LLC’S MOTION FOR  
LEAVE TO FILE OVERLENGTH  
REPLY MEMORANDUM**

Case No. 2:23-cv-00482-RJS-DBP

Chief Judge Robert J. Shelby  
Magistrate Judge Dustin B. Pead

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individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual;

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to DUCivR 7-1(a)(6), Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson, (collectively, the “Defendants”), and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC (collectively, the “Relief Defendants”), by and through undersigned counsel, hereby submit this Motion for Leave to File Overlength Reply Memorandum. For good cause shown herein, this motion should be granted.

### **BACKGROUND**

Following Defendants and Relief Defendants’ Motion to Dissolve Temporary Restraining Order and Modify Temporary Receivership Order (ECF No. 132), the SEC and the Receiver each filed independent responses, (ECF Nos. 166 and 168 respectively) (together, the “Responses”). Each response raised different arguments, primarily focused on individual involvement in the proceedings. *See* ECF Nos. 166 & 168. Collectively, the Responses total twenty-nine pages of briefing, which surpasses the applicable rule-imposed limit, were the two Responses subject to the limits imposed on a single response under DUCivR 7-1(a)(4)(C).

### **ARGUMENT**

Under DUCivR 7-1(a)(6), the Court may authorize an overlength reply so long as the parties move the Court before filing the proposed reply, state the number of additional pages needed, and state the good cause that justifies the additional length. This motion satisfies those requirements, and as such the motion should be granted.

In their Responses, the SEC and the Receiver each presented unique and independent arguments, which collectively amount to a total of twenty-nine pages of responsive briefing. Rather than request leave to reply to each response independently, Defendants and Relief Defendants have consolidated their responsive arguments and have been able to condense their

reply to only twelve pages, which is still two more than the applicable limit. However, the unique arguments raised by both the SEC and the Receiver and Defendants and Relief Defendants attempts to consolidate their reply provide good cause justifying this modest request for two additional pages to ensure the Court is fully apprised and may rule on the arguments on the merits.

### **CONCLUSION**

For the foregoing reasons, this motion should be granted.<sup>1</sup>

DATED: October 2, 2023

Respectfully submitted,

**KUNZLER BEAN & ADAMSON, PC**

*/s/ Taylor J. Smith* \_\_\_\_\_

Matthew R. Lewis

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<sup>1</sup> Defendants and Relief Defendants sought from the SEC and Receiver a stipulation or confirmation that they did not intend to oppose this request. The SEC indicated they did not oppose the two additional pages. Defendants and Relief Defendants did not receive confirmation regarding the Receiver's position on this issue.

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 2nd day of October, 2023, I caused a true and correct copy of the foregoing **DEFENDANTS JASON R. ANDERSON, JACOB S. ANDERSON, SCHAD E. BRANNON, AND ROYDON B. NELSON AND RELIEF DEFENDANTS BUSINESS FUNDING SOLUTIONS, LLC, BLOX LENDING, LLC, THE GOLD COLLECTIVE, LLC, AND UIU HOLDINGS, LLC'S MOTION FOR LEAVE TO FILE OVERLENGTH REPLY MEMORANDUM** to be submitted for electronic filing through the Court's CM/ECF system and accordingly served on all parties.

/s/ Michelle Hansen  
Michelle Hansen